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October 23, 2020

Honorable Vernon S. Broderick
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

APPLICATION DENIED
SO ORDERED *Vern Broderick*
VERNON S. BRODERICK
U.S.D.J. 10/27/2020

BY CM/ECF

Re: *Tyreik Williams v. City of New York et al.*, No. 18 Civ. 5175 (VSB) (KHP):
Joint Application To Restore Case

Dear Judge Broderick:

The parties jointly move the Court to restore the above-captioned matter to active status and to stay all deadlines pending the final resolution of a settlement. *See* Dkt. 119.

By way of background, the parties tentatively reached a settlement agreement on September 11, 2020. *See* Dkt. 117. Since then, Mr. Williams's Counsel has been diligently working with him to complete the settlement papers and tender executed copies to the City. Unfortunately, due to delays in sending mail to and from the Wende Correctional Facility (where Mr. Williams is incarcerated), Counsel does not yet have the executed settlement papers.

Thus, solely as a protective measure, the parties respectfully request that the Court restore this case to active status and stay all deadlines. Counsel will continue to work with Mr. Williams and the facility to complete and review the papers. Once the final executed papers are received from Mr. Williams, Counsel will tender them to the City and complete the settlement. In accordance with the Court's individual rules, the parties will file the executed settlement so that the Court will retain jurisdiction to enforce it. In addition, the parties will update the Court with a status letter if, within 30 days, the settlement is still not finalized.

Thank you for your attention to this matter.

Hon. Vernon S. Broderick

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Justin M. Ellis
W. Alex Harris
Leonid Grinberg

*Limited Pro Bono Counsel
for Tyreik Williams*

Respectfully submitted,



Stephanie M. Vilella Alonso

Counsel for Defendants